



October 25, 2024

VIA ECF

Honorable Ona T. Wang
United States District Court
500 Pearl Street
New York, NY 10007

Re: *The New York Times Company v. Microsoft Corp.*, 23-cv-11195; *Daily News, L P, et al. v. Microsoft Corp.*, 1:24-cv-3285: Response Lett Microsoft's Document Custodians

Dear Magistrate Judge Wang:

Microsoft submits this response to the News Plaintiffs' October 22, 2024 letter (Dkt. 273) requesting that Microsoft add Mustafa Suleyman as a custodian. The parties met and conferred on October 24, and reached an agreement that Microsoft will (1) add Mustafa Suleyman as a custodian in these consolidated cases, and (2) the parties will negotiate a limited set of search terms for this custodian. The parties reserve arguments regarding the proper date range for collection from this custodian. The parties have also reached agreement regarding the two custodians—Scott Counts and Satish Manivannan—referenced in footnote 2 of the News Plaintiffs' October 22 letter.

As such, all issues raised in Docket No. 273 have now been resolved.

Respectfully submitted,

/s/ Jared B. Briant

Jared B. Briant

Counsel for Defendant Microsoft Corporation

cc: Counsel of Record (via ECF)